

DUNS Number Requirements Changing

The requirement for organizations to have a DUNS number in order to receive federal funds is changing. To receive federal funds as a grant recipient, an organization must register in the federal System for Award Management (SAM) at SAM.gov and obtain a new, non-proprietary Unique Entity Identifier (UEI) **by April 2022**.

Examples of federal funds for libraries that your organization may receive include Library Services and Technology Act (LSTA), DLIS Florida CARES Act, DLIS Florida American Rescue Plan Act of 2021 (ARPA), grants from the Institute of Museum and Library Services (IMLS) and grants from the National Endowments for the Humanities and the Arts.

Background

The Office of Management and Budget (OMB) revised the Uniform Guidance for grants (2 C.F.R. part 200) on August 13, 2020. This was the first major update of the Uniform Guidance since 2014. The relevant regulation that describes the required transition away from using DUNS numbers (from Dun & Bradstreet) as entity identifiers to [Unique Entity Identifiers](#) (UEI) (from Ernst & Young through SAM.gov) is in [2 CFR § 25.300](#):

Requirement for recipients to ensure subrecipients have a unique entity identifier.

(a) A recipient [The Florida Department of State, Division of Library and Information Services] may not make a subaward to a subrecipient unless that subrecipient has obtained and provided to the recipient a unique entity identifier [formerly DUNS which is now transitioning to a new UEI number]. Subrecipients are not required to complete full SAM registration to obtain a unique entity identifier.

(b) A recipient must notify any potential subrecipients that the recipient cannot make a subaward unless the subrecipient has obtained a unique entity identifier as described in paragraph (a) of this section.

The transition from DUNS to UEI was originally slated for December 2020 but was adjusted to allow additional time for the federal government, grantees and subrecipients to prepare for the transition. Detailed information regarding the transition is available from the U.S. General Services Administration in this Unique Entity Identifier Update: [Government Transition from DUNS Number to New Unique Entity Identifier Extended](#).

What does this mean for my organization?

For an organization to be eligible to apply for and access federal funds after April 2022, the library (or local government unit) or organization will need to obtain a UEI. If your library's county, municipality or other organization that operates a library holds the DUNS number for your library, please ensure that they have completed the DUNS to UEI transition.

1. If your organization already has a DUNS number **AND** is registered in SAM.gov, that DUNS number will be automatically updated to a UEI. This scenario is most likely for libraries

using a local governmental unit DUNS number. Use the [SAM Status Tracker](#) to check your organization's registration status with SAM.

2. If your organization already has a DUNS number but is **NOT** registered in SAM.gov, you will need to complete SAM.gov registration in order to have your DUNS number transitioned to a UEI. This scenario is likely for organizations that hold their own DUNS numbers and have not applied directly to a federal agency for a grant. Use the [SAM Status Tracker](#) to check your organization's registration status with SAM. Refer to the [New to SAM.gov for Financial Assistance](#) PDF from the U.S. General Services Administration for details on how to register for a SAM.gov account and maintain that registration.

Between now and April 2022, organizations may access federal grant funds using either a DUNS number or a UEI. After April 2022, organizations must have a UEI to apply for and receive federal grant funds.



Image Credit: [Grants.gov](#). Timeline for Organization DUNS and UEI

How long does it take to register with SAM?

(From [Grants.gov](#)) Generally, after completing the online registration and sending your notarized letter confirming the entity administrator, it takes up to two weeks to register with SAM, then one (1) business day for updates made in SAM to be reflected in Grants.gov. However, your organization must first have an EIN. If your organization does not have an EIN, you should allow an additional [5 weeks to request and obtain an EIN from the IRS](#).

What do I do once I've registered with SAM.gov and obtained a UEI?

Currently, DUNS numbers are reported in the Department of State Grants System (DOSGS). Once you have received your UEI, you will need to add this information to your organization in DOSGS, which will be modified to accommodate the transition. The UEI number may also be required on any forms used to request federal grant funds from any other entity offering grants.

Summary

- DUNS numbers are transitioning to Unique Entity Identifiers (UEI).
- Libraries and systems will need the new UEI to receive federal funds (e.g., LSTA) after April 2022.
- Until April 2022, organizations can still use their DUNS numbers to satisfy the UEI requirement to access federal funds.
- The UEI can be obtained by [registering in SAM.gov for financial assistance](#).
- If your organization uses a local governmental entity's DUNS number to access federal funds, contact them to ensure you are registered in SAM.gov.
- If your organization uses its own DUNS number to access federal funds or does not have a DUNS number, you should obtain a DUNS number and register in SAM.gov to obtain a UEI.
- This notice satisfies the Department's [The Florida Department of State, Division of Library and Information Services] obligation under [2 CFR § 25.300 \(b\)](#) to notify your library or library system, an eligible subrecipient of federal funds, that you must have a UEI to receive a federal grant like LSTA.